

March , 2004

Cory Carr
Environmental Specialist
Operating Permits Section
Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Dear Mr. Carr:

RE: Northern Natural Gas Compressor Station, Oakland, Iowa

On February 12, 2004, we received the electronic copy of the draft Title V operating permit for the subject facility. It is our understanding that this permit is being made available for public comment from February 18, 2004 through March 19, 2004. We have reviewed this draft permit and our comments are enclosed. If you have any questions regarding these comments, please do not hesitate to contact Harriett Jones, of my staff, at (913) 551-7730, or jones.harriett@epa.gov.

Sincerely,

JoAnn Heiman, Acting Branch Chief
Air Permitting and Compliance Branch
Air, RCRA, and Toxics Division

Enclosure

cc: Doug Campbell, Chief, Air Operating Permits, IDNR (w/encl)

EPA Comments on Draft Title V Operating Permit
for Northern Natural Gas Compressor Station, Oakland, Iowa

1. The Fact Sheet states that there are 27 emission units, and the Title V Renewal Application Review Notes state that the “facility has 27 significant emission units and 27 emission points” consisting of 14 engines (9 horizontal engines with 2 emission points each and 5 vertical engines with one emission point each), 2 boilers, and 1 auxiliary generator. By our count, this would amount to 17 significant emission units and 26 emission points. Please clarify.
2. Is the 2500 gallon storage tank listed as an insignificant unit the same unit that was described in the initial permit as a 1000 gallon tank? If so, please verify the correct capacity.
3. The phrase “federally enforceable” on page 7 should be deleted. All terms and conditions in a Title V permit are enforceable both federally and by the issuing state except for any specific provisions that are enforceable only by the state, which should be labeled “state enforceable only.” To avoid any confusion, particular portions of the permit should not be identified as “federally enforceable.”
4. Please explain the purpose of specifying the following emission limits both as plant-wide limits and also as emission unit specific limits for each of the emission units at the facility: Sulfur Dioxide: ≤ 500 ppmv and Particulate Matter ≤ 0.1 gr/dscf.
5. Please explain the purpose of specifying the following emission limit both as a plant-wide limit and also as an emission unit specific limit for each of the emission units at the facility (except for the auxiliary generator): Opacity ≤ 40 %.
6. In Section 2 (AR) of the renewal permit application submitted by the source under the cover letter dated November 19, 2002, the applicant proposes to keep records of “natural gas fuel use” to demonstrate compliance. Please explain the frequency (*e.g.*, monthly, yearly) of this recordkeeping. In order to be enforceable, this requirement must be included in the permit.
7. Where a decision is made that no monitoring is necessary, the rationale for the “no monitoring” decision should be explained briefly in the Statement of Basis. For example, it might not be necessary to periodically monitor an uncontrolled unit that burns only natural gas because even if operating 8760 hours per year, the calculated emissions would only amount to 15% of the emission limit (*i.e.*, there would be a margin of compliance of 85%).

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8. The final MACT standard applicable to Stationary Internal Combustion Engines (Subpart ZZZZ) and the standard applicable to Boilers and Industrial Furnaces (Subpart DDDDD) were signed by the Administrator during the last week in February 2004. These rules will appear soon in the Federal Register.
9. Finally, as we approach the end of the issuance cycle of the initial Title V permits and move towards the renewal permits, we can and should look for ways to learn from our experiences over the last several years and seek to continuously improve. One such opportunity for improvement that impacts all Iowa Title V permits is the combination of the two separate documents currently prepared by IDNR (*i.e.*, the Fact Sheet and the Permit Writer's Notes) into a single document (*i.e.*, Statement of Basis). We do not believe that this would result in additional effort, and we believe that the benefit would be a significantly improved Statement of Basis. We hope that you will carefully consider this recommendation as it applies to this and future permits.

